EXHIBIT 41

Page 1

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON TALCUM POWDER PRODUCTS MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

PASQUALINA RAUSA, Plaintiff, MDL NO. 16-2738 (FLW) (LHG) VS.) CASE NO. JOHNSON & JOHNSON, et al.,) 3:20-cv-02947-FLW-LHG Defendants.

WEDNESDAY, JANUARY 27, 2021

Remote deposition of Pasqualina Rausa, conducted at the location of the witness in Ponte Vedra, Florida, commencing at 12:58 p.m., on the above date, before Dianne N. Sarkisian, Certified Shorthand Reporter and Registered Professional Reporter.

> GOLKOW LITIGATION SERVICES 877.370.3377 ph | 917.591.5672 fax deps@golkow.com

	Page 2		Page 4
1	APPEARANCES:	1	Ponte Vedra, Florida
2	WALL THE POLICE OF THE PROPERTY OF THE PROPERT	2	Wednesday, January 27, 2021
3	JENNIFER EMMEL, ESQUIRE Beasley Allen Law Firm	3	12:58 p.m.
5	218 Commerce Street	4	***
4	Montgomery, Alabama 36104	5	(PLAINTIFF'S PREMARKED EXHIBITS 1-3
_	(334) 495-1306	6	PHOTOGRAPHS MARKED FOR IDENTIFICATION.)
5 6	Jennifer.Emmel@BeasleyAllen.com Appearing on behalf of the Plaintiff	7	COURT REPORTER: Good afternoon. We are
O	(via Zoom.)	8	on the record.
7		9	The attorneys participating in this
8	LODIC M CROPER ECOLURE	10	deposition acknowledge that I, court reporter, am
9	LORI C. McGRODER, ESQUIRE Shook, Hardy & Bacon, LLP	11	not present with the witness and that I will be
10	2555 Grand Boulevard	12	•
	Kansas City, Missouri 64108		reporting the proceedings and administering the
11	(816) 474-6550	13	oath remotely.
12	Lmcgroder@shb.com	14	This arrangement is pursuant to the
	Appearing on behalf of the Defendants	15	Florida Supreme Court Administrative Order
13	(via Zoom.)	16	AOSC-20-16 and extended by AOSC-20-17. The
14		17	parties and their counsel consent to this
15 16		18	arrangement and waive any objections to this
17		19	manner of reporting.
18		20	Please indicate your agreement by
19		21	stating your name and your agreement on the
20 21		22	record.
22		23	Thank you.
23		24	MS. McGRODER: Lori McGroder of Shook
2.4			
24 25	Page 3	25	Hardy & Bacon, on behalf of J&J, and we agree to Page 5
25	Page 3		Page 5
	INDEX Witness Page	1	Page 5 the process here today.
25	INDEX	1 2	Page 5 the process here today. MS. EMMEL: Jennifer Emmel with Beasley
1 2	INDEX Witness Page Pasqualina Rausa DIRECT EXAMINATION	1 2 3	Page 5 the process here today. MS. EMMEL: Jennifer Emmel with Beasley Allen for the Plaintiff. We also agree.
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	Page 78		Page 80
1	Q. What years was he deployed?	1	A. About five days.
2	A. He went When the Gulf War broke out,	2	Q. And did you ever have irregular periods?
3	he deployed and he stayed He deployed in	3	A. No, no. I never had a problem.
4	November and he stayed till the following May. So	4	Q. Did you ever have periods that were too
5	I don't remember the year that was, though; 1990s.	5	heavy?
6	I don't remember what year.	6	A. No.
7	Q. Early '90s?	7	Q. Did you ever have painful periods?
8	A. I think so, yeah.	8	A. No.
9	Q. And so what did he do during his	9	Q. Did you ever have symptoms with your
10	What was his military experience like, his job?	10	menstrual cycle like cramping or headaches?
11	A. He was in communications.	11	A. No.
12	Q. Any other times he was deployed?	12	Q. Did you ever at any time have to see a
13	A. No.	13	physician related to your menstrual cycle?
14	MS. McGRODER: Let's take a short break,	14	A. No.
15	five, ten minutes. And when we come back, we'll	15	Q. Did you ever miss any school, for
16	talk a little bit more about your medical history,	16	example, because you had to stay home with cramps
17	okay?	17	or anything like that?
18	THE WITNESS: Um-hum.	18	A. No. I could never understand why women
19	MS. McGRODER: Okay, thank you.	19	or girls used to complain 'cause I never had that.
20	COURT REPORTER: Okay. Off the record.	20	Q. And do you know what year you finished
21	It's 2:37. We'll come back at 2:47, something	21	menopause?
22	like that.	22	A. I believe it was between 55 and 56.
23	MS. McGRODER: Okay, 2:47.	23	Q. Do you know when your last menstrual
24	COURT REPORTER: Yes, ma'am. Thank you.	24	period was?
25	(Recess taken at 2:37 p.m.)	25	A. I wouldn't be able to tell you the
	Page 79		Page 81
1	(Back on the record at 2:47 p.m.)		
		1	month, no. I don't know.
2	COURT REPORTER: We're on the record.	1 2	month, no. I don't know. Q. Did you have symptoms when you were
2	COURT REPORTER: We're on the record.		Q. Did you have symptoms when you were
	· · · · · · · · · · · · · · · · · · ·	2	Q. Did you have symptoms when you were going through menopause?
3	COURT REPORTER: We're on the record. MS. McGRODER: Thank you. BY MS. McGRODER:	2 3	Q. Did you have symptoms when you were going through menopause?A. The only thing I had was hot flashes.
3 4	COURT REPORTER: We're on the record. MS. McGRODER: Thank you. BY MS. McGRODER: Q. Ms. Rausa, I'm going to ask you a few	2 3 4	Q. Did you have symptoms when you were going through menopause?A. The only thing I had was hot flashes.Q. For how long did you experience hot
3 4 5	COURT REPORTER: We're on the record. MS. McGRODER: Thank you. BY MS. McGRODER: Q. Ms. Rausa, I'm going to ask you a few questions and this is where we're going to get	2 3 4 5	Q. Did you have symptoms when you were going through menopause?A. The only thing I had was hot flashes.Q. For how long did you experience hot flashes with menopause?
3 4 5 6	COURT REPORTER: We're on the record. MS. McGRODER: Thank you. BY MS. McGRODER: Q. Ms. Rausa, I'm going to ask you a few questions and this is where we're going to get into areas that are, you know, about your personal	2 3 4 5 6	 Q. Did you have symptoms when you were going through menopause? A. The only thing I had was hot flashes. Q. For how long did you experience hot flashes with menopause? A. Well, I know that I retired in, I was
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3 4 5 6 7 8	COURT REPORTER: We're on the record. MS. McGRODER: Thank you. BY MS. McGRODER: Q. Ms. Rausa, I'm going to ask you a few questions and this is where we're going to get into areas that are, you know, about your personal and medical history, including your gynecologic history.	2 3 4 5 6 7 8	 Q. Did you have symptoms when you were going through menopause? A. The only thing I had was hot flashes. Q. For how long did you experience hot flashes with menopause? A. Well, I know that I retired in, I was around 61, and I remember having to keep a little
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	Page 98		Page 100
1	, humm.	1	. That's correct, right?
2	Q. You don't disagree that's what this	2	A. (No Response.)
3	record states, right?	3	Q. Is that right?
4	A. That's what it states, but I know for a	4	A. Yes.
5	fact, I was about 55 or 56 years old when I last	5	Q. ; is that
6	had a period.	6	right?
7	Q. Okay.	7	A. Right.
8	A. The reason why I remember that is	8	Q. That's
9	because my sister told me	9	correct, right?
	and so I don't	10	A. Right.
11	know where they're getting this information from	11	Q. I think that's all the questions I have
12	because I know it was between 55 and 56.	12	on this document.
13	Q. Okay. But we've now seen two records	13	Have you had issues with your weight
14	that state	14	throughout your adulthood?
		15	A. On and off, yes.
	You don't disagree with that,	16	Q. And I'm going to just ask you some
17	do you? I mean, that's what's in the records,	17	general questions about your weight.
18	right?	18	If the records reflect
19	 A. It's in the record, but let me see. 		
20	About how old was I in 2002? Um		, do you have any reason to disagree
21	Q. Well, you were born in '55. 2005 you	21	with that, that
22	would have been 50. So in 2002 you'd be about 47.	22	A. No, I don't disagree.
23	A. Yeah. I don't think it was that I	23	Q. Is it correct that you have a history of
24	don't I don't know. It can't be that young.	24	diabetes?
25	I don't know where that information came from, but	25	A. No, that's not correct.
	Page 99		Page 101
1	it's not correct.	1	Q. You were diagnosed with diabetes; is
2	Q. So your testimony is both of these	2	that correct?
3	records are wrong?	3	 No, I was never diagnosed with diabetus.
		3	11. 110,1 was never diagnosed with didoctus.
4	A. The age, yes, is wrong.	4	I went to a doctor and he told me
5	The state of the s		
	A. The age, yes, is wrong.	4	
5	A. The age, yes, is wrong.Q. Okay. This record also states, just	4	
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5	A. The age, yes, is wrong. Q. Okay. This record also states, just going through here, that That's correct, right? A. Yes. Q. And that	4	I went to a doctor and he told me Q. Have you ever taken the drug,
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		1	
	Page 178		Page 180
1 2	MS. McGRODER: I have no further questions, either.	1 2	CERTIFICATE OF REPORTER
3	Ms. Rausa, it was wonderful meeting you	3	THE STATE OF FLORIDA)
3 4		4	COUNTY OF MIAMI-DADE)
	today. And thank you very much for being here for	5	COCIVIT OF NIM IN BIBLE)
5	the deposition. I appreciate your patience with	6	I, DIANNE N. SARKISIAN, CSR, Certified
6	the whole virtual process and just really good	7	Shorthand Reporter, and Notary Public of the State
7	luck to you and thanks for participating.	8	of Florida, do hereby certify that I was authorized
8	THE WITNESS: Thank you.	9	to and did stenographically report the deposition
9	MS. McGRODER: Let's go off the record.	10	of PASQUALINA RAUSA; that a review of the
10	COURT REPORTER: Yes, ma'am, off the	11	transcript was waived; and that pages 1 through 178
11	record.	12	is a true record of the foregoing transcript.
12	(Deposition concluded at 5:23 p.m.	13	I FURTHER CERTIFY that I am not a
13	Signature not reserved.)	14	relative nor employee of any counsel, nor any of
14		15	the parties in said suit, nor am I financially
15		16	interested in the action.
16		17	DATED this 5th day of February 2021, at
17		18	Miami; Miami-Dade County, Florida.
18		19	
19		20	
20		21	Diama N. Cadii
21		21	Dianne N. Sarkisian
22		22	Certified Court Reporter
23		23	
24		24	
25		25	
	Page 179		
1	CERTIFICATE OF OATH		
2			
	THE OTHER OF THE ONE A		
3	THE STATE OF FLORIDA)		
3 4	THE STATE OF FLORIDA) COUNTY OF MIAMI-DADE)		
3 4 5	COUNTY OF MIAMI-DADE)		
3 4	COUNTY OF MIAMI-DADE) I, Dianne N. Sarkisian, CSR, Certified		
3 4 5 6	COUNTY OF MIAMI-DADE) I, Dianne N. Sarkisian, CSR, Certified Shorthand Reporter, in my capacity as a Notary Public of		
3 4 5 6 7	COUNTY OF MIAMI-DADE) I, Dianne N. Sarkisian, CSR, Certified		
3 4 5 6 7 8	COUNTY OF MIAMI-DADE) I, Dianne N. Sarkisian, CSR, Certified Shorthand Reporter, in my capacity as a Notary Public of the State of Florida at Large, authorized to administer		
3 4 5 6 7 8 9	COUNTY OF MIAMI-DADE) I, Dianne N. Sarkisian, CSR, Certified Shorthand Reporter, in my capacity as a Notary Public of the State of Florida at Large, authorized to administer oaths on this 27th day of January, 2021, at 12:58 PM,		
3 4 5 6 7 8 9 10 11	I, Dianne N. Sarkisian, CSR, Certified Shorthand Reporter, in my capacity as a Notary Public of the State of Florida at Large, authorized to administer oaths on this 27th day of January, 2021, at 12:58 PM, certify that PASQUALINA RAUSA appeared before me via Zoom pursuant to Florida Supreme Court Administrative Order AOSC-20-16 and extended by AOSC-20-17, and took an		
3 4 5 6 7 8 9 10 11 12 13	I, Dianne N. Sarkisian, CSR, Certified Shorthand Reporter, in my capacity as a Notary Public of the State of Florida at Large, authorized to administer oaths on this 27th day of January, 2021, at 12:58 PM, certify that PASQUALINA RAUSA appeared before me via Zoom pursuant to Florida Supreme Court Administrative Order AOSC-20-16 and extended by AOSC-20-17, and took an oath or affirmation for the purpose of giving testimony		
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